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COUNSEL FOR SUPERIOR AIR PARTS, INC.

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In Re:	§	
	§	Case No. 08-36705-bjh-11
SUPERIOR AIR PARTS, INC.,	§	Chapter 11
	§	
Debtor.	§	
	§	

**AMENDED WITNESS AND EXHIBIT LIST IN SUPPORT OF  
SUPERIOR AIR PARTS, INC.'S MOTION TO ENFORCE**

COMES NOW, Superior Air Parts, Inc. ("Superior" or "Debtor"), the Debtor, and files this Witness and Exhibit List in Support of Motion to Enforce, set for hearing on May 21, 2014 at 9:00 AM, and in support thereof would show the following:

**WITNESS LIST**

NAME	DESCRIPTION OF ANTICIPATED TESTIMONY TOPICS
Kent Abercrombie Superior Air Parts, Inc. 621 S. Royal Lane, #100 Coppell, TX 75019-3805	History of bankruptcy case, the business relationship between Superior and TAE, Superior's ownership of its drawings and other technical data, the provision of technical data to TAE under confidentiality agreements, work performed by TAE on Superior's behalf, and Superior's PMA's and regulatory (FAA) compliance.
Jeff Lochridge Superior Air Parts, Inc. 621 S. Royal Lane, #100	Data and drawings owned by Superior currently in TAE/Kübler's possession, the business relationship between Superior and TAE, Superior's ownership of its drawings and other technical data, the

NAME	DESCRIPTION OF ANTICIPATED TESTIMONY TOPICS
Coppell, TX 75019-3805	provision of technical data to TAE under confidentiality agreements, work performed by TAE on Superior's behalf, and Superior's PMA's and regulatory (FAA) compliance.
Keith Chatten Superior Air Parts, Inc. 621 S. Royal Lane, #100 Coppell, TX 75019-3805	Data and drawings owned by Superior currently in TAE/Kübler's possession, the business relationship between Superior and TAE, Superior's ownership of its drawings and other technical data, the provision of technical data to TAE under confidentiality agreements, work performed by TAE on Superior's behalf, and Superior's PMA's and regulatory (FAA) compliance.
Jasper M. Wolffson Brödermann & Jahn Neuer Wall 71 20354 Hamburg Germany	The business relationship between Superior and TAE, Superior's ownership of its drawings and other technical data, the provision of technical data to TAE under confidentiality agreements, work performed by TAE on Superior's behalf, and Dr. Kübler's attempts to sell Superior's property.

### **EXHIBIT LIST**

EXHIBIT NO.	DESCRIPTION OF EXHIBIT
1	Chapter 11 Voluntary Petition [Bankr. Doc. No. 1]
2	08-36705-bjh11 Docket Sheet
3	Schedules A-J with Summary of Schedules [Bankr. Doc. No. 4]
4	Schedule B22 – Domain Names [Bankr. Doc. No. 4-3]
5	Schedule B22 – List of PMAs [Bankr. Doc. No. 4-4]
6	Schedule B22 – Trademarks [Bankr. Doc. No. 4-5]
7	Schedule B23 – Type Certificates [Bankr. Doc. No. 4-6]
8	Schedule G – Open Purchase Orders [Bankr. Doc. No. 4-13]
9	Amended Schedule B with Exhibit [Bankr. Docs. Nos. 263 and 263-1]
10	Amended Schedule G with Exhibit [Bankr. Docs. Nos. 265 and 265-1]
11	Amended Disclosure Statement with Exhibits [Bankr. Docs. Nos. 321 – 321-3]
12	Amended Chapter 11 Plan [Bankr. Doc. No. 322]
13	Order Approving Fourth Amended Disclosure Statement [Bankr. Doc. No. 325]
14	Order Confirming Third Amended Plan of Reorganization [Bankr. Doc. No. 404]

EXHIBIT NO.	DESCRIPTION OF EXHIBIT
15	Notice of Effective Date of the Third Amended Plan of Reorganization [Bankr. Doc. No. 432]
16	Affidavit In Support of Debtor's Expedited Motion to Approve Bid Procedures for Sale of Substantially All of Debtor's Assets Free and Clear of Liens with Exhibits [Bankr. Docs. Nos. 30 through 30-3]
17	Affidavit In Support of Debtor's Expedited Motion to Approve Bid Procedures for Sale of Substantially All of Debtor's Assets Free and Clear of Liens with Exhibits [Bankr. Docs. Nos. 31 through 31-2; also Adv. Doc. No. 8 - Superior 0655-Superior 0662 in Adv. Proc. No. 12-03035-BJH]
18	Documents Produced by Dr. Kübler in Discovery and Bates Labeled TAE IA000001-IA000736
19	Supplier Agreement between Thielert Aircraft Engines GmbH and Superior Air Parts, Inc. dated December 15, 2001
20	Amendment to Supplier Agreement Thielert Aircraft Engines GmbH and Superior Air Parts, Inc., dated October 21, 2005
21	Letter from Craig Simon, Esq. to Christopher Robison, Esq. dated March 25, 2014
22	Summary of Documents Produced by Dr. Kübler in Discovery and Bates Labeled TAE IA000001-IA000736
23	Letter from Superior to TAE/Kübler dated April 24, 2013
24	Letter from counsel for TAE to Superior dated June 3, 2013
25	Letter from counsel for Superior to counsel for TAE dated July 18, 2013 (with attached list of part numbers)
26	Tolling Agreement effective as of August 1, 2013
27	Motion to Compel Arbitration and Exhibits Thereto Filed December 9, 2013 [Bankr. Dkt. 689]
28	Insolvency Administrator's Responses and Objections to Superior Air Parts Inc.'s First Set of Discovery Requests

Superior further reserves the right to examine any witness listed or called by any other party, and to call any impeachment and/or rebuttal witnesses. Superior further reserves the right to offer any exhibit listed or presented by any other party, and to offer any impeachment and/or rebuttal exhibits.

Respectfully submitted,

By: /s/ Christopher Robison

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COUNSEL FOR SUPERIOR AIR  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served this 24<sup>th</sup> day of June, 2014, pursuant to the Federal Rules of Bankruptcy Procedure, via Facsimile and/or ECF/PACER upon the following:

Daniel P. Winikka and Craig Simon  
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*Attorneys for Dr. Kübler, Insolvency  
Administrator for TAE*

/s/ Christopher A. Robison  
Christopher A. Robison